

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:21-cr-00180

vs.

GOVERNMENT'S INITIAL PRETRIAL  
CONFERENCE SUMMARY STATEMENT

GREGORY MARK GLEESING,

Defendant. /

**I. DISCOVERY**

**A. Statements of Defendant**

**1. Oral Statements [Rule 16(a)(1)(A)]**

- ☐ There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).
- ☒ There are the following written records of oral statements:  
**Interviews with FBI dated February 26, 2020 (FBI-001856) and January 27, 2020 (FBI-001832)**

the substance of which

- ☐ has been disclosed to defense counsel
- ☒ will be disclosed to defense counsel by **at initial pretrial conference.**

**2. Written or Recorded Statements [Rule 16(a)(1)(B)]**

- ☐ There are no written or recorded statements or grand jury testimony of defendant.
- ☒ There are the following written or recorded statements or grand jury testimony:

**Grand jury testimony**

All written or recorded statements

- ☐ have been disclosed to defense counsel
- ☒ will be disclosed to defense counsel by **IPTC**

**B. Defendant's Prior Record [Rule 16(a)(1)(D)]**

- ☐ The government has made due inquiry and is not aware of any prior criminal record.
- ☒ The government has disclosed defendant's prior criminal history. **Disclosed at IPTC.**
- ☐ The government is now making inquiry into defendant's prior criminal history.  
The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects [Rule 16(a)(1)(E)]

- ☐ The government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The government has the following documents, tangible objects, and physical evidence:
- ☐ Controlled Substances:
  - ☐ Drug Paraphernalia:
  - ☒ Records: **Amazon records; Postal Service and private carrier shipping records; bank records; internet service provider records; cellular telephone records; textbook vendor records; rental vehicle records; debit and credit card transaction records.**
  - ☐ Drug Records:
  - ☐ Firearms:
  - ☐ Inventory (attached)
  - ☒ Other: **audio recordings of Amazon concession calls; surveillance videos; pictures from surveillance; textbooks; MyVanilla visa cards and other debit or credit devices; cellular telephones recovered in search; Amazon shipping boxes recovered from prior residences of Talsma.**
- ☐ The government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- ☐ State
  - ☒ Federal (list case number and caption) **All from United States District Court, W.D. Michigan**

*In the Matter of the Tracking of White Colored 2008 Porsche Cayenne Station Wagon, 1:18-MJ-220;*

*In the Matter of the Search of 1130 E. Osterhout Avenue; 1:21-MJ-114*

*In the Matter of the Search of Dark-Colored 2020 Dodge Caravan, 1:21-MJ-115;*

*In the Matter of the Search of 2012 Mercedes Benz Station Wagon, 1:21-MC-116;*

*In the Matter of the Search of TextNow account coronaschmona, 1:21-mj-221*

- ☒ They have been made available for inspection and copying by defense counsel.  
**Produced at IPTC.**
- ☐ Defense counsel should make arrangements with

D. Reports of Examinations and Tests [Rule 16(a)(1)(F)]

- ☐ The government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☒ The government has or expects to have reports of the following examinations and tests:
- ☐ Drug Analysis      ☐ Handwriting      ☐ Fingerprints
  - ☐ DNA      ☐ Firearms/Nexus      ☐ Gun Operability
  - ☒ Computer Forensics **of cell phones and other devices**      ☐ Other

E. Reciprocal Discovery

☒ The government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

☒ The government does not presently intend to introduce 404(b) evidence.

☐ The government does presently intend to introduce the following 404(b) evidence:

☐ The government will provide pretrial notice of 404(b) evidence by

G. Other Discovery Matters:

**II. TRIAL**

A. The government requests a ☒ jury ☐ non-jury trial.

B. Length of trial excluding jury selection is estimated at 4-5 days

**III. MISCELLANEOUS**

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

☒ The government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.

☐ The government is aware of the following potential conflict(s):

☒ Government's plea negotiation policy: No concessions within 2 weeks of Final Pretrial Conference

Date: October 25, 2021

Ronald M. Stella  
Assistant United States Attorney